

**INVOICE**

Zieher & Associates, P.C.  
 11 Broadway, Suite 615  
 New York, New York 10004

Date: 11/17/2023

Abdulrahman Gelardi  
 et al.

Date of Loss:

Date	Description	Hours	Rate	Amount
12/4/2022	Meeting with client	1.0	\$500.00	\$ 500.00
12/7/2022	Review Emergency Order to Show Cause for pre-action discovery	0.8	\$500.00	\$ 400.00
12/8/2022	E-File Emergency Order to Show Cause	0.3	\$500.00	\$ 150.00
12/8/2022	NYSCEF - OTSC for pre-action disclosure and RJl filing fees	n/a	n/a	\$ 360.47
12/10/2022	Investigate Stanulis and Silver Shield	2.0	\$500.00	\$ 1,000.00
12/13/2022	Draft subpoena for Silver Shield Security LLC and Stephan Stanulis	0.5	\$500.00	\$ 250.00
12/13/2022	E-file Stanulis/Silver Shield subpoena	0.1	\$500.00	\$ 50.00
12/13/2022	Draft Land Air Sea preservation letter	0.4	\$500.00	\$ 200.00
12/14/2022	Postage for letter to Land Air Sea	n/a	n/a	\$ 47.30
12/22/2022	Conference call with Emanuel Kataev, Esq. and Richard Rosenzweig, Esq.	0.3	\$500.00	\$ 150.00
12/26/2022	Call with Silver Shield Security LLC and Stephan Stanulis' attorney Richard Rosenzweig, Esq.	0.2	\$500.00	\$ 100.00
12/27/2022	Email correspondence to Richard Rosenzweig, Esq. to set up Stanulis EBT	0.1	\$500.00	\$ 50.00
1/4/2023	Email correspondence with Daniella regarding case developments; email correspondence with Daniella and process server regarding service by publication.	0.2	\$500.00	\$ 100.00
1/5/2023	Email correspondence with Daniella and her attorneys regarding oral argument on OTSC and upcoming court appearance	0.5	\$500.00	\$ 250.00
1/7/2023	Email correspondence with Daniella regarding documents from Stanulis, deposition logistics.	0.3	\$500.00	\$ 150.00
1/20/2023	Call with attorney Richard Rosenzweig	0.3	\$500.00	\$ 150.00
1/20/2023	Review email correspondence and attachment from Richard Rosenzweig, Esq.	0.3	\$500.00	\$ 150.00
1/23/2023	Email correspondence to Richard Rosenzweig, Esq.	0.2	\$500.00	\$ 100.00
1/23/2023	Draft subpoena Land Air Sea records regarding tracking device records	0.5	\$500.00	\$ 250.00
1/23/2023	Draft subpoena to NYS Department of State, Licensing division	0.5	\$500.00	\$ 250.00

1/23/2023	E-file NYS Department of State, licensing division subpoena	0.1	\$500.00	\$ 50.00
1/23/2023	E-file Land Air Sea subpoena	0.1	\$500.00	\$ 50.00
1/24/2023	Review PI contract between Silver Shield Security LLC and Safa Abdulrahim Gelardi and IME Companions	0.5	\$500.00	\$ 250.00
1/25/2023	Call with attorney Richard Rosenzweig	0.1	\$500.00	\$ 50.00
1/25/2023	Draft subpoena for Thomas Brandon	0.5	\$500.00	\$ 250.00
1/25/2023	Draft subpoena for IME Companions and Safa Abdulrahim Gelardi	0.5	\$500.00	\$ 250.00
1/25/2023	investigate Thomas Brandon	1.0	\$500.00	\$ 500.00
1/26/2023	Email correspondence to Richard Rosenzweig, Esq. regarding questions about contract between Stanulis and Safa	0.5	\$500.00	\$ 250.00
1/26/2023	E-file IME Companions/Safa subpoena	0.1	\$500.00	\$ 50.00
1/26/2023	E-file Thomas Brandon subpoena	0.1	\$500.00	\$ 50.00
1/27/2023	Review email correspondence from Richard Rosenzweig, Esq. regarding questions about contract	0.2	\$500.00	\$ 100.00
1/27/2023	Email correspondence with Daniella, client and private investigator regarding subpoenas; correspondence with Daniella regarding service of subpoenas; correspondence with PI regarding Thomas Brandon subpoena.	0.3	\$500.00	\$ 150.00
1/31/2023	Call with representative from Land Air Sea to discuss subpoena	0.3	\$500.00	\$ 150.00
2/1/2023	Draft Summons with Notice	1.5	\$500.00	\$ 750.00
2/1/2023	E-file Summons with Notice	0.2	\$500.00	\$ 100.00
2/1/2023	Summons with Notice filing fees	n/a	n/a	\$ 216.28
2/3/2023	Review Land Air Sea subpoenaed records	2.0	\$500.00	\$ 1,000.00
2/5/2023	Email correspondence with Daniella, client and private investigator regarding service of subpoena on Thomas Brandon and request for additional information from PI.	1.0	\$500.00	\$ 500.00
2/7/2023	Draft subpoena for Thomas Brandon (updated address)	0.3	\$500.00	\$ 150.00
2/8/2023	Prepare for Court appearance	2.0	\$500.00	\$ 1,000.00
2/9/2023	Appearance at Order to Show Cause hearing	0.5	\$500.00	\$ 250.00
2/9/2023	Draft proposed order following Order to Show Cause hearing	0.6	\$500.00	\$ 300.00
2/9/2023	E-file proposed order	0.2	\$500.00	\$ 100.00
2/13/2023	Email correspondence with David Mossberg, Esq.	0.4	\$500.00	\$ 200.00
2/13/2023	Review Demand for Complaint from Vito, Safa, IME Companions	0.2	\$500.00	\$ 100.00
2/21/2023	Call with Richard Rosenzweig, Esq.	0.2	\$500.00	\$ 100.00

2/21/2023	Email correspondence with Daniella and client regarding Stanulis	0.3	\$500.00	\$ 150.00
2/22/2023	E-mail correspondence to Richard Rosenzweig, Esq. regarding case and federal preliminary injunction	0.5	\$500.00	\$ 250.00
2/22/2023	Draft preservation letter to Vito Gelardi	0.4	\$500.00	\$ 200.00
2/22/2023	Draft preservation letter to IME Companions/Safa	0.4	\$500.00	\$ 200.00
2/23/2023	Call with David Mossberg, Esq. from NYS Department of Licensing regarding our subpoena for Stanulis and Silver Shield's private investigator license records	0.4	\$500.00	\$ 200.00
2/23/2023	Research into Stephen Stanulis and Silver Shield Security LLC	1.0	\$500.00	\$ 500.00
2/23/2023	Draft preservation letter to Thomas Brandon	0.4	\$500.00	\$ 200.00
2/23/2023	Postage to send preservation letter to Thomas Brandon expense	n/a	n/a	\$ 8.34
2/23/2023	Postage to send preservation letter to Vito Gelardi expense	n/a	n/a	\$ 11.30
2/23/2023	postage to send preservation letter to safa Gelardi and IME companions expense	n/a	n/a	\$ 11.30
2/24/2023	Call with Richard Rosenzweig, Esq.	0.1	\$500.00	\$ 50.00
2/24/2023	Email correspondence to DL and Emanuel Kataev, Esq. regarding NYS Department of State subpoena and conversation with attorney from NYS Department of State	0.4	\$500.00	\$ 200.00
2/27/2023	Draft comments for Stanulis to address in his affidavit	1.0	\$500.00	\$ 500.00
3/1/2023	Review and revise Stephan Stanulis' affidavit	0.5	\$500.00	\$ 250.00
3/1/2023	Draft FOIL request to NYS Department of State regarding Silver Shield and Stanulis' private investigator license	0.5	\$500.00	\$ 250.00
3/3/2023	Draft letter releasing Stanulis and Silver Shield from claims arising from this incident	0.8	\$500.00	\$ 400.00
3/8/2023	Review Stanulis' revised affidavit	0.5	\$500.00	\$ 250.00
3/15/2023	Email correspondance with Richard Rosenzweig, Esq. regarding Stanulis' appearance at federal court hearing	0.1	\$500.00	\$ 50.00
3/24/2023	Call with Richard Rosenzweig, Esq.	0.1	\$500.00	\$ 50.00
3/24/2023	Call with Richard Rosenzweig, Esq.	0.1	\$500.00	\$ 50.00
5/9/2023	Review Defendants' Motion to Dismiss	0.7	\$500.00	\$ 350.00
5/10/2023	Review demand for complaint - Thomas Brandon	0.1	\$500.00	\$ 50.00
6/19/2023	Draft Summons and Complaint	4.0	\$500.00	\$ 2,000.00
6/20/2023	Draft affirmation in opposition to defendants' motion to dismiss	2.0	\$500.00	\$ 1,000.00
6/20/2023	E-file Summons and Complaint	0.3	\$500.00	\$ 150.00

6/22/2023	Review notice of rejection	0.1	\$500.00	\$ 50.00
8/8/2023	Nicoletti & Harris - Service of Summons with Notice and NYS Department of State subpoena fees	n/a	n/a	\$ 554.12
	Total	36.6		\$19,509.11